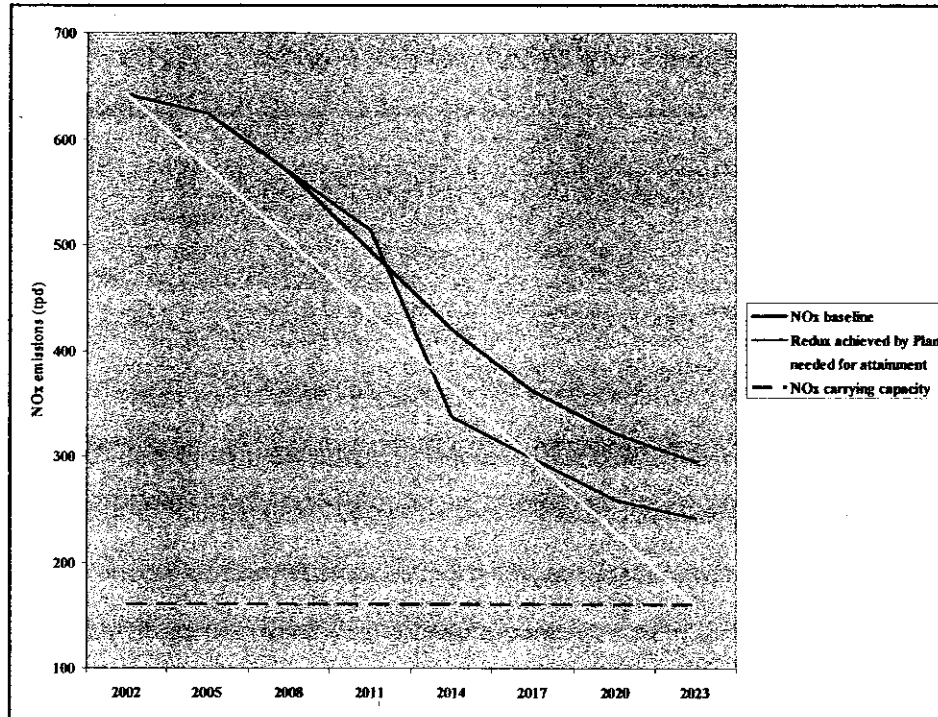


Paul Cort
07-6-2

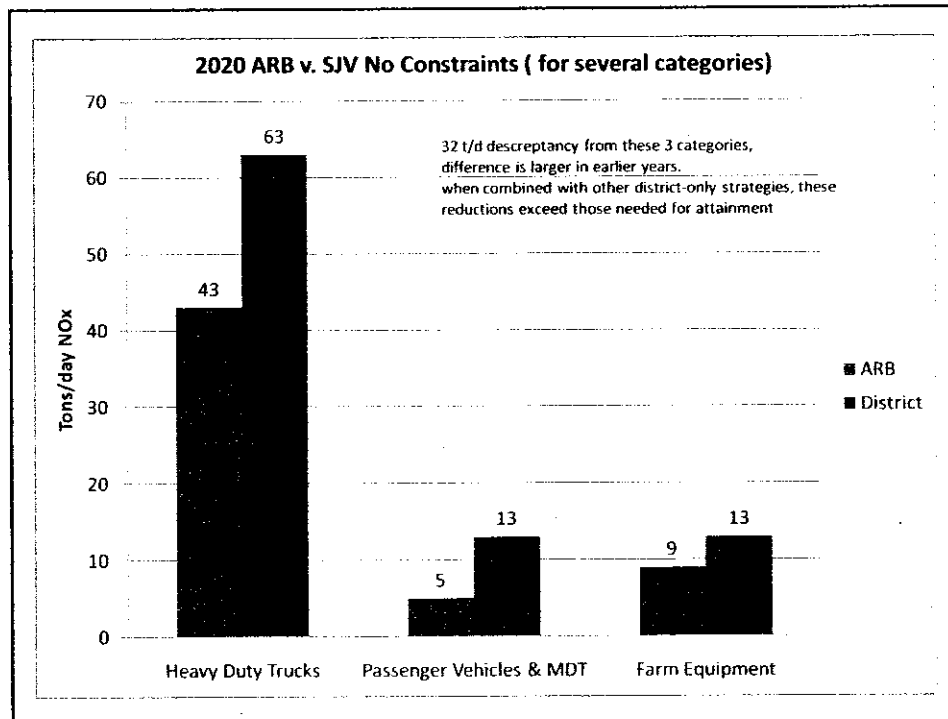


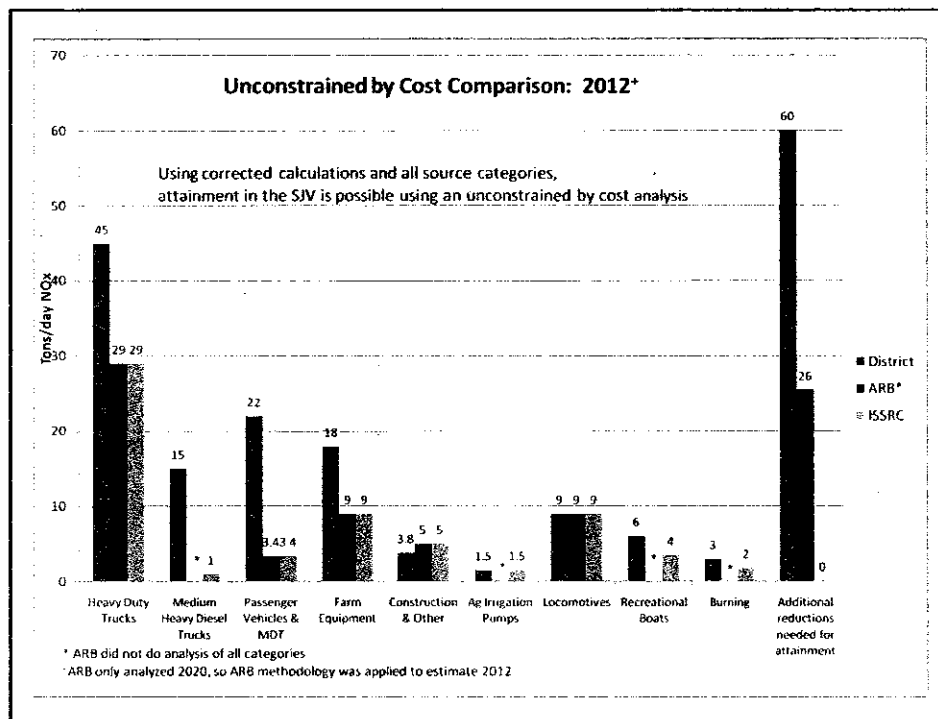
Plan is Only Marginally Better than Status Quo

Source	2023 Baseline (Status Quo) (tpd)	2023 Emissions w/ SJV Plan (tpd)	% Reduction from Baseline
On-road mobile	102	79	23%
Off-road mobile	80	58	28%
Stationary/Area	113	104	8%
Total	295	241	18%

Plan Does Little to Address 135 tpd Shortfall from Status Quo

Source	Reductions from Baseline (tpd)	Portion of 135 tpd Shortfall Addressed
On-road mobile	23	17%
Off-road mobile	22	16%
Stationary/Area	9	7%
Total	54	40%





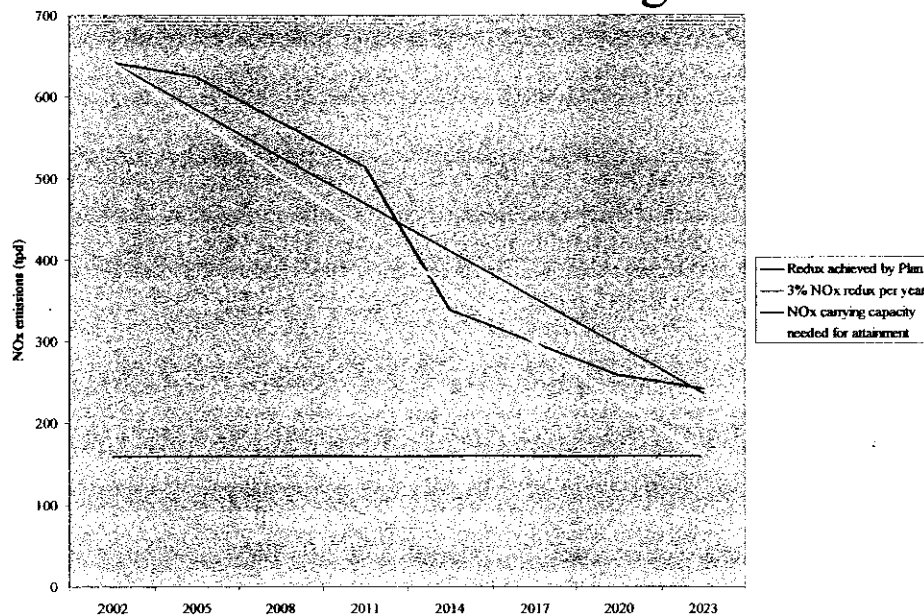
“The attainment strategy requirements must be met in addition to the RFP condition. Total emission reductions are determined by the attainment demonstration, implying that reductions averaging greater than 3% per year ... are required if shown to be necessary by the model demonstration. The 3% per year RFP requirement is thus a minimum requirement.”

— EPA NOx Substitution Guidance

“To say that 2% of 100 units of [one pollutant] and 3% of 200 units of [another] equals 5% of one or the other or both is simply improper...EPA contends that Congress cannot have intended application of the statute in a way that is inconsistent with basic mathematical principles, so this approach is not acceptable.”

-- EPA's Approval of SJV's 2003 PM-10 Plan
(69 Fed. Reg. 30006)

Is This Reasonable Progress?



More Could Be Done



- Require Flare Minimization Plans to control NOx emissions from Refinery Flaring
- Require tighter NOx limits for glass melting furnaces
- Require tighter NOx limits for Solid Fuel-Fired Boilers
- Remove exemptions for certain Stationary Gas Turbines
- Adopt a mitigation fee program for Residential Water Heaters
- Require 70-80% reductions in emissions from composting facilities
- Require 86% control of both wine and brandy production
- By 2013, restrict operation of dirtiest, out-dated diesel off-road equipment on bad ozone days
- By 2013, restrict operation of dirtiest, out-dated diesel farm equipment on bad ozone days
- Expand applicability of graphic arts rule
- Reduce applicability threshold for LCAF rule and require aggressive emission reduction targets
- Increase rule stringency for Agricultural Irrigation Pumps and Internal Combustion Engines
- Revise NSR to reflect extreme designation
- Prepare RACT analysis down to 10 tons per year

But the District Did Nothing

Turnlier Consider It
Ignore It
more
NO COMMITMENTS